

DOCKET SECTION

USPS - ST-53

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

SUPPLEMENTAL TESTIMONY OF
DONALD M. BARON
ON BEHALF OF
UNITED STATES POSTAL SERVICE

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Supplemental Testimony
of
Donald M. Baron

AUTOBIOGRAPHICAL SKETCH

The autobiographical sketch filed in conjunction with my direct testimony,
USPS-T-17, is hereby incorporated by reference.

1 **I. PURPOSE OF TESTIMONY**

2 The purpose of this testimony is to adopt Library References LR-H-136,
3 137, 138, 139, 140, 141, 142, 143, 189, 225, and 289 for purposes of my
4 testimony in this case. Library References H-136 through H-189 were filed on
5 July 10, 1997, Library Reference H-225 was filed on August 8, 1997, and Library
6 Reference H-289 was filed on October 1, 1997. To the extent that these
7 references might be considered by some not to have been incorporated by
8 reference in my prior direct testimony and in interrogatory responses filed earlier
9 in this proceeding, I hereby formally adopt and sponsor them at this time.

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11 **II. SUMMARY OF ADOPTED LIBRARY REFERENCES**

12 The Postal Service Library References I adopt are as follows:

13	H-136	Creation of Data File TPANL96.WEIGHT.DISK
14	H-137	Description of Methods For Estimating Load Time Elasticities
15		For City Carrier Letter Routes
16	H-138	The Actual Stops Model
17	H-139	The Actual Deliveries Model
18	H-140	Calculation of Fixed Time Per Stop
19	H-141	The Quadratic Model For Estimating Running Time Elasticities
20	H-142	The Quadratic Model With Interactions For Estimating
21		Running Time Elasticities
22	H-143	Calculation of Fiscal Year 1996 Average CCS Coverages
23	H-189	Documentation of Rural Carrier Cost Development
24	H-225	Measuring the Effects of New Deliveries on Load Time
25	H-289	The Calculation of an Alternative Elasticity In Response to
26		UPS/USPS-T17-14

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28 Library references H-136 through 143 and H-189 consist of additional
29 documentation of the various analyses reported in my earlier direct testimony,
30 and were filed simultaneously with that testimony. Library reference H-225

1 consists of additional documentation of the relationship between new deliveries
2 and load time, which was provided in response to interrogatory NAA/USPS-T17-
3 8a. LR-H-289 documents an alternative cost elasticity calculation, prepared in
4 response to interrogatory UPS/USPS-T17-14. Each of the above library
5 references were prepared by me or under my direct supervision.